

Presentment Date and Time: September 14, 2016 at 10:00 a.m. (ET)

Objection Date and Time: September 7, 2016 at 10:00 a.m. (ET)

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of Unsecured Creditors of Gawker Media LLC, et al.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	Chapter 11
	:	
Gawker Media LLC, <i>et al.</i> , ¹	:	Case No. 16-11700 (SMB)
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X	:	

**NOTICE OF PRESENTMENT OF THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS OF GAWKER MEDIA LLC, *et al.*, APPLICATION FOR ENTRY OF AN
ORDER AUTHORIZING THE RETENTION AND EMPLOYMENT OF MOURANT
OZANNESAS SPECIAL FOREIGN COUNSEL FOR THE COMMITTEE
EFFECTIVE NUNC PRO TUNC TO AUGUST 22, 2016**

PLEASE TAKE NOTICE that upon the annexed application of the Official Committee of Unsecured Creditors of Gawker Media LLC, *et al.*, (the “**Application**”), dated August 23, 2016, the undersigned will present the *Order Authorizing the Retention and Employment of Mourant Ozannes as Special Foreign Counsel to the Official Committee of Unsecured Creditors Pursuant to Sections 327(e), 328(a), 330, and 1103(a) of the Bankruptcy Code Effective Nunc*

¹ The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Kinja Kft. (5056). The offices of Gawker Media LLC and Gawker Media Group, Inc. are located at 114 Fifth Avenue, 2d Floor, New York, NY 10011. King Kft.’s offices are located at Andrássy út. 66 1062 Budapest, Hungary.

Pro Tunc to August 22, 2016, substantially in the form annexed to the application as **Exhibit A** (the “**Proposed Order**”), for signature to the Honorable Stuart M. Bernstein of the United States Bankruptcy Court for the Southern District of New York (the “**Court**”), in Room 723, One Bowling Green, New York, New York 10004-1408, on **September 14, 2016 at 10:00 a.m.** (prevailing Eastern Time).

PLEASE TAKE FURTHER NOTICE that responses or objections (“**Objections**”) to the Application and the relief requested therein, if any, shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, shall set forth the basis for the response or objection and the specific grounds therefore, and shall be filed with the Court electronically in accordance with General Order M-399 by registered users of the Court’s case filing system (the User’s Manual for the Electronic Case Filing System can be found at <http://www.nysb.uscourts.gov>, the official website for the Court), with a hard copy delivered directly to chambers and served so as to be actually received no later than **September 7, 2016, at 10:00 a.m.** (prevailing Eastern Time) (the “**Objection Deadline**”), upon the following parties: (i) the Debtors, Gawker Media LLC, 114 Fifth Avenue, 2d Floor, New York, NY 10011, Attn. Heather Dietrick (heather@gawker.com); (ii) counsel for the Debtors, Ropes & Gray LLP, 1211 Avenue of the Americas, New York, NY 10036, Attn: Gregg M. Galardi (gregg.galardi@ropesgray.com); (iii) the Office of the United States Trustee for the Southern District of New York, 201 Varick Street, Suite 1006, New York, NY 10014, Attn: Greg Zipes & Susan Arbeit; (iv) counsel to the Official Committee of Unsecured Creditors, Simpson Thacher & Bartlett, 425 Lexington Avenue, New York, NY 10017, Attn: Sandy Qusba (squsba@stblaw.com) and William T. Russell (wrussell@stblaw.com); (v) counsel to US VC Partners LP, as Prepetition Second Lien Lender, Latham & Watkins LLP, 330 North Wabash

Avenue, Suite 2800, Chicago, IL 60611, Attn: David Heller (david.heller@lw.com) & Keith A. Simon, 885 Third Avenue, New York, New York 10022, Attn: Keith A. Simon (keith.simon@lw.com); (vi) counsel to Cerberus Business Finance, LLC, as DIP Lender, Schulte Roth & Zabel LLP, 919 Third Avenue, New York, New York 10022, Attn: Adam C. Harris (adam.harris@srz.com); (vii) Thomas & LoCicero PL, 601 S. Boulevard, Tampa, FL 33603, Attn: Gregg D. Thomas, (gthomas@tlolawfirm.com); and (viii) those persons who have formally appeared and requested service in these cases pursuant to Bankruptcy Rule 2002.

PLEASE TAKE FURTHER NOTICE that a copy of the Application may be obtained free of charge by visiting the website of Prime Clerk LLC at <http://cases.primeclerk.com/gawker>. You may also obtain copies of any pleadings by visiting the Court's website at <http://nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

PLEASE TAKE FURTHER NOTICE that if no objections are timely filed and received by the Objection Deadline, the requested relief in the Application may be granted without further notice or a hearing. If an objection is filed, you will be notified of a hearing to consider the requested relief.

Dated: New York, New York
August 23, 2016

SIMPSON THACHER & BARTLETT LLP

By: /s/ Sandeep Qusba
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